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11 Attorney for Defendant
STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 JAMES BROWN,

15 Plaintiff,

16 v.

17 STATE FARM MUTUAL AUTOMOBILE
18 INSURANCE COMPANY; and DOES 1
through 25, inclusive,

19 Defendants.
20

CASE NO. C07-02743 PJH

**THE PARTIES' JOINT STIPULATED
ADMINISTRATIVE MOTION TO
CONTINUE THE DISPOSITIVE
MOTION DEADLINE**

21
22 The parties to the above-entitled action hereby respectfully submit their Joint Stipulated
23 Administrative Motion to Continue the Deadline to Hear Dispositive Motions pursuant to Judge
24 Hamilton's Pretrial Instructions and Civil L.R. 7-11.

25 1. The parties have been working diligently toward moving this case forward in an
26 efficient, expeditious manner and have exchanged written discovery and responses;

27 2. In March 2008, the parties executed a "Stipulation For Confidentiality Of Settlement
28 Discussions;"

1 3. The parties also agreed to postpone taking certain depositions while they considered
2 the potential for settlement;

3 4. The current deadline to hear dispositive motions is May 28, 2008;

4 5. State Farm is prepared to file a motion for summary judgment on Wednesday, April
5 23, 2008, under the Court's current dispositive motion deadline. Plaintiff has specifically identified
6 four individuals he would like to depose before State Farm files its motion for summary judgment,
7 and has indicated that there may be additional individuals.

8 6. Therefore, the parties hereby jointly request that the Court extend the deadline to
9 hear dispositive motions 60 days from May 28, 2008, to July 30, 2008.

10
11 Dated: April 21, 2008

LAW OFFICES OF JOHN T. BELL

12
13 By John T. Bell
14 JOHN T. BELL
Attorneys for Plaintiff
15 JAMES BROWN

16 Dated: 4/21, 2008

HAYES DAVIS BONINO ELLINGSON
McLAY & SCOTT, LLP

17
18 By [Signature]
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Attorneys for Defendant
21 STATE FARM MUTUAL AUTOMOBILE
22 INSURANCE COMPANY
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[PROPOSED] ORDER

IT IS SO ORDERED:

Pursuant to the joint motion of the parties, the deadline to hear dispositive motions shall be continued from May 28, 2008 to July 30, 2008.

Dated: _____, 2008

HONORABLE PHYLLIS HAMILTON
UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF
CALIFORNIA